SRO
STATE SCHOOL REFORM/REDESIGN OFFICE
Michigan Department of Technology, Management and Budget

Unreasonable Hardship Determination Report
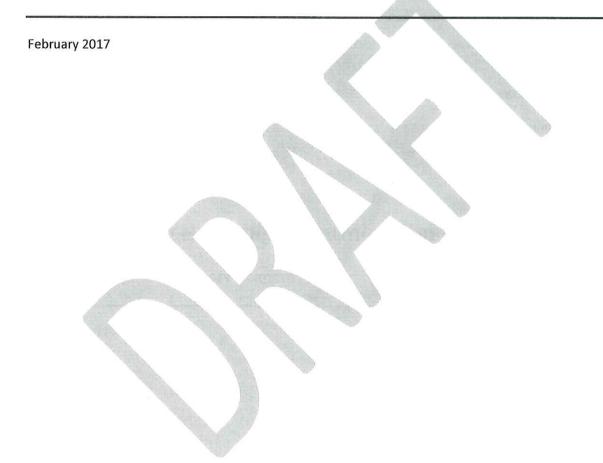
Osborn College Preparatory Academy

February 2017

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Framework

State School Reform/Redesign Office Background and Legal Authority

The State School Reform/Redesign Office (SRO) was established in 2010 to serve as Michigan's academic accountability office. The mission of the SRO is to turn Michigan's Priority Schools into the highest-performing schools in Michigan. The SRO's vision is to create the necessary conditions for a globally superior public education system. To do this, the SRO uses both incentives for academic success and consequences for chronic failure. The following state and federal statutes establish the SRO and govern the office's action steps:

Michigan's Revised School Code 380.1280c: Section 1280c of the Revised School Code charges the SRO with the responsibility of identifying and supervising the lowest achieving 5% of schools (Priority Schools). Priority Schools submit reform/redesign plans to improve performance, and the SRO is granted authority to implement intervention if academic progress is not made (i.e. CEO operator for multiple schools, State School Reform/Redesign District (SSRRD), etc.). Priority Schools are required to submit monitoring reports to the SRO in a manner and frequency as determined by the SRO. The statute also provides exemptions for districts under emergency management.

Michigan's Executive Order No. 2015-9: Executive Order 2015-9 transferred the SRO from the Michigan Department of Education (MDE) to the Department of Technology, Management, and Budget (DTMB). It also transferred all authority, powers, duties, functions, and responsibilities assigned to MDE and the Superintendent of Public Instruction under MCL 380.1280c to the SRO.

Michigan Public Act 192 (i.e. Enrolled House Bill 5384): The law divides the Detroit Public School District (DPS) into two separate districts and requires the SRO to mandate school closures via specified stipulations.

Under these statutes, the State School Reform/Redesign Office must make notifications and issue orders to Public School Academy Authorizers and/or Traditional Public School Superintendents/Board Presidents establishing different levels of accountability based on the performance of the schools they operate/authorize.

Purpose

On January 20, 2017, the SRO published the order subjecting Osborn College Preparatory Academy to a Next Level of Accountability pending an Unreasonable Hardship Determination as required under subsection 391(3), MCL 380.391(3). The purpose of this report is to:
- Outline the Unreasonable Hardship Review Process
- Detail the findings of the Unreasonable Hardship Review
- Publish the final Unreasonable Hardship Determination for Osborn College Preparatory Academy, and
- Detail next steps that the SRO recommends in light of the final Unreasonable Hardship Determination.

Unreasonable Hardship Review Process

In accordance with MCL 380.391(3), the SRO must complete an analysis of whether closure of Osborn College Preparatory Academy will result in unreasonable hardship to pupils attending Osborn College Preparatory Academy. The SRO will consider other public school options available to students in the grade levels offered and geographic area served by the public school identified for closure to determine if closing the identified school(s) would result in an unreasonable hardship for the impacted students. The SRO is committed to ensuring that the closure of a failing school does not necessitate the enrollment of a displaced student in another failing school. The SRO's Unreasonable Hardship Review will consist of three parts:

1. **Part 1:** A comprehensive review of all available data related to the past and current performance of the identified school(s)
2. **Part 2:** An academic and an operational on-site review
3. **Part 3:** A detailed examination of other public school options available to students in the grade levels offered and geographic area served by the public school identified for closure.

A set of research-based Turnaround Practices served as the framework for the SRO's Unreasonable Hardship Review. The Turnaround Practices[1] are based on both academic and practice-based research on the common characteristics of successful turnaround schools and are organized into five different domains:

- **Domain 1:** Leadership, Shares Responsibility, and Professional Collaboration
- **Domain 2:** Intentional Practices for Improving Instruction
- **Domain 3:** Providing Student-Specific Supports and Instruction to All Students
- **Domain 4:** School Climate and Culture
- **Domain 5:** District System: Districts develop systems to support, monitor, and sustain turnaround efforts

By structuring the SRO's Unreasonable Hardship Review around these domains the SRO is acknowledging that in determining unreasonable hardship one must not only examine historic performance but must also work intimately with local community members and educators to determine if the academic and operational realities of the identified school reflective of a school poised for rapid turnaround.

All of the information produced and insights gained from the Unreasonable Hardship Review Process have informed the SRO's Final Unreasonable Hardship Determination, which consists of a series of 3 Key Questions:

- **Question 1:** Are the academic and operational realities of the identified school reflective of a school poised for rapid turnaround?
- **Question 2:** Are there are sufficient other public school options reasonably available to these pupils?
- **Question 3:** Would the proposed NLA action result in an unreasonable hardship to the displaced pupils?

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[1] See Edmonds, 1979; Bryk et al., 2010; Marzano, 2003; Newmann et al., 2001; Lane et al., 2014)

Unreasonable Hardship Review Part 1: Data Review

In an effort to inform the Unreasonable Hardship Determination, the SRO requested a comprehensive set of both academic, cultural, and operational data from Osborn College Preparatory Academy. The data provided can be viewed in Appendix A. In reviewing this data as well as previously state-reported academic data, the SRO has identified the following Key Takeaways related to the past, and current realities of Osborn College Preparatory Academy.

Data Review Key Takeaways

- **Academic** (Domains 2 and 3)
    - Proficiency
        - In 2013, the school earned a top-to-bottom ranking of 3.
        - The school earned a top-to-bottom ranking of 0 in 2014, 2015, and 2016.
        - ███████ scored proficient on state assessments between 2014 and 2016 in Mathematics.
        - Between 2014 and 2016, the percent of students proficient in English/Language Arts increased from 7.1% to 8.7%.
        - Between 2014 and 2016, the percent of economically disadvantaged students in English/Language Arts decreased from 8.3% to 7.8%.
        - ███████ scored proficient on state assessments between 2014 and 2016 in Science.
        - Between 2014 and 2016, the percent of students proficient in Social Studies increased from ███████
        - Between 2014 and 2016, the percent of economically disadvantaged students proficient in Social Studies increased from ███ to 5.2%
    - Graduation Rate
        - Graduation between 2014 and 2015 decreased from 68.8% to 67.7%
        - Male graduation rate increased from 54.1% in 2014 to 66.7% in 2015.
        - Male graduation rate was the only increase between 2014 and 2015.
        - Graduation rate for students with disabilities showed the greatest decrease from 70.6% in 2014 to 46.7% in 2015.
- **Climate and Culture** (Domains 3 and 4)
    - Enrollment
        - Enrollment has decreased by 65 students between 2014 and 2016.
        - Enrollment of economically disadvantaged students has decreased from 196 to 153 during the same time period.
        - In 2014, there were 82 students in the 10th grade; in 2015, there were 64 students in 11th grade; in 2016, there were 46 students in 12th grade
            - This decrease represents a reduction of 36 students from the 2016 4-year graduation cohort.
        - The percentage of students with disabilities has decreased from 29% (77 students) in 2014 to 21% (43 students) in 2016.
        - The percentage of economically disadvantaged students have fluctuated between 74 and 79 percent of the population from 2014 to 2016.
    - Attendance
        - Student attendance rate increased from 75% to 77% between 2014 and 2016.

- The chronically absent rate has decreased from 88% (254 students) to 84% (180 students) between 2014 and 2016.
- **Professional** (Domains 1 and 5)
  - Teacher Evaluation
    - The number of teachers receiving a highly effective rating had reduced from 18 (90%) to 11 (78.6%) between 2014 and 2016.
    - The number of teachers rated as effective increased from 1 (5%) to 3 (21.4%) between 2014 and 2016.
    - One teacher was rated as minimally effective in 2014.
    - One teacher was rated ineffective in 2015.
  - The number of teachers have decreased by 6 (from 20 to 14) between 2014 and 2016.

Unreasonable Hardship Review Part 2a: Academic On-Site Review

On Tuesday, February 7, 2017 two representatives of the SRO conducted the Academic On-Site Review for Osborn College Preparatory Academy. The purpose of this visit was to gain valuable insight related to the current academic realities of Osborn College Preparatory Academy from its building leaders, teachers, parents and community members. The Academic On-Site Review was structured as follows:

- Interviews with Building Leadership
- Building Walk-Through with Classroom Observations
- Teacher Leader Focus Group
- Student Focus Group
- Parent/Community Focus Group

In a letter sent on January 27, 2017, the SRO requested that Osborn College Preparatory Academy nominate both teacher leaders as well as parents and community members to participate in the Academic On-Site Review.

The review was structured around the research-based Turnaround Practices and questions that served to frame both the interviews as well as the focus group discussions. Responses from each conversation were analyzed and evaluated for their alignment with key indicators of best practices for high-gain, rapid turnaround schools. The following pages provide the results from the site visit. Rubric ratings (see below) and corresponding evidence (in bulleted form) is provided for each Turnaround Practice component.

Rubric Descriptors

Strong alignment with best practice	Moderate alignment with best practice	Low alignment with best practice
All indicators are evident and there is strong evidence that key structures and practices are being used effectively to improve instruction.	Some of the indicators are evident and there is some evidence that key structures and practices are being used effectively to improve instruction.	A few or none of the indicators are evident and/or there is little to no evidence that key structures and practices are being used effectively.

A key purpose of the site visit is to assess each school's capacity to engage in accelerated turnaround and to inform decisions regarding unreasonable hardship. As such, site reviewers and the SRO are focused on the following overarching questions.

Domain 1: Leadership, Shares Responsibility, and Professional Collaboration

- Does the school have a collaborative environment (e.g., sufficient teaming structures and ways of working together) that can lead to accelerated instructional improvement?
- Does the school leadership have systems in place to monitor and support the implementation of improvement strategies, including the use of frequent classroom observations?

Domain 2: Intentional Practices for Improving Instruction

- Does the school utilize a common core curriculum that is instructionally coherent and that displays a strong understanding of high quality instruction, among teachers and as supported and observed by administrators?
- Does school leadership have a system in place to identify teachers that may need additional support, and specific strategies for providing such support?

Domain 3: Providing Student-Specific Supports and Instruction to All Students

- Does the school have and actively utilize a system of assessments and interventions capable of providing student-specific supports and subsequent monitoring of the effectiveness of interventions?

Domain 4: School Climate and Culture

- Does the school provide a safe, orderly, and respectful environment for students and a collegial and professional culture among adults?

Determining Capacity for Successful Turnaround

Key Question 1: What are the core issues and challenges that have kept students at your school from achieving? How are you addressing these issues and challenges?

Key Question 2: What are the key practices and strategies that distinguish your school, and will allow your school to improve, leading to increased student achievement in the near future?

	Alignment with Best Practice
Adaptive Instructional Improvement All stakeholders espouse an "improvement mindset" reflected in the school's continuous review and assessment of improvement practices and strategies used within the school. Key Indicators • The school stops or modifies strategies that are not working and expands those that are working.	
Respectful and Trusting Learning Environment All stakeholders (students, teachers, community members, etc.) have high expectations for students and value working with and learning from each other. Key Indicators • Parents and students state that they believe that all of the students in the school will succeed (e.g., will do well in classes, graduate, attend and graduate college). • Teachers and administrators work together in formal and informal teams on a regular basis.	
Instructional Rigor Instruction and instructional practices are engaging, differentiated, and sufficiently challenging for all students. Key Indicators • Teachers provide all students with lessons and instruction directly aligned with common core standards and aligned instructional practices. • Written lessons and taught instruction includes stated and written learning objectives, multiple instructional strategies, and challenging (e.g., higher order) tasks, problems, and questioning strategies.	
Targeted Interventions The school expertly uses specific instructional strategies/interventions executed with a high degree of instructional expertise. Key Indicators • Student work is consistently improving. • Instructional strategies and interventions are implemented with fidelity.	

- The principal of Osborn College Preparatory Academy is in her first year at the school.
- During observations college pennants and FAFSA posters were observed in the halls and classrooms.
- Guidelines for successfully completing the SAT were observed in some classrooms.
- The administration and staff demonstrated a focus on a specific instructional strategies with a process for professional development and monitoring of implementation.

- The team observed use of blackboard configurations that includes objectives in common language, opening activity, agenda, and homework.
- All focus groups indicated that observable academic growth has occurred at the school within the past year.
- Students shared opportunities they have been provided through programs that occur at Osborne Preparatory Academy.
    - A group traveled to Malawi Africa with Build-on.
    - The neighborhood Service Organization assists students in getting jobs.
    - Students traveled to Washington DC with the JAG program.
    - Mentoring programs with the Detroit Pistons and other partners.
- While on the site-visit a group of students were on a field trip to ATT through JAG to gain interview and other career related skills.

Turnaround Strategy Domain 1: *Leadership, Shard Responsibility, and Professional Collaboration*

The school has established a community of practice through leadership, shared responsibility, and professional collaboration.

Key Question: How, and to what extent, do you (and your leadership team) cultivate shared ownership, responsibility, and professional collaboration in the school?

Turnaround Strategy Components	Alignment with Best Practice
Teaming, Shared Leadership and Responsibility, and Collaboration Distributed leadership structures and practices are apparent throughout the school building in the form of an active and well-represented Leadership Team and grade-level and vertical teams. Key indicators: • The school leadership team meets regularly and includes representation from all grades and student needs. • Grade-level and vertical teams meet regularly. • Teams exhibit a strong commitment to high expectations for all students and a willingness to work together to improve instruction.	
Using Teams, Shared Leadership, and a Collaborative and Trusting Environment to Accelerate Improvement Administrators and teachers (through teacher teams or involvement in the leadership team) are monitoring and assessing the implementation and impact of key improvement strategies, use of resources, classroom instructional practices, and non-academic supports on student achievement. Key indicators: • **Adaptation:** Leadership has the demonstrated ability to adapt, innovate and do whatever it takes to improve student achievement. • **Instructional Observation:** Instruction is formally and informally observed and meaningful feedback is provided. Teachers, as well as students, are held to high expectations.	

- Most focus groups reported that the principal who began in September 2016, is a strong, dynamic leader with a vision for providing a strong academic program and the necessary supports that will enable a student to succeed in college or career of the student's choice.
- Teachers and administrations explained that the leadership team meets every Friday to review data, discuss PLC outcomes from the Tuesday PLC meetings the teacher teams hold.
- Teachers and administrators reported the PLCs include grade level and content level teams.
- Teachers reported that three staff members participate in the leadership team meetings to communicate information between the leadership and PLC teams.
- PLC teams include grade and content level teachers, the data coach, and the CES coach to assist with data discussions.
- It was also reported that the administration joins some of the PLC meetings as well.

- It was reported that the administration conducts multiple surveys on a regular basis to gather data from teachers, students, and community partners.
- Administration reported that the alumni association, community partners, and administrators from all three Osborne schools meet monthly.
- Community partners described their monthly meeting with the schools as an opportunity to address challenges facing Osborne, Develop strategies to assist students, and provide necessary supports so that teachers are able to focus on academic instruction.
- Community partners and administration also reported that they meet separately monthly to discuss student needs and programs being implemented at Osborne Preparatory Academy.
- Teachers and administrators reported scheduled monthly observations with immediate feedback.
- Teachers reported that they observe colleagues classrooms regularly.
- Administration reported that enrollment in each of the Osborne schools has previously been done by random selection. Furthermore, Osborne Preparatory Academy is planning to revise this method to a system focused upon career pathways and student interest to better serve the students.

Turnaround Strategy Domain 2: *Intentional Practices for Improving Instruction*

The school uses an aligned system of common core curricula, assessments, and common instructional practices across the school and content areas, and employs intentional practices for improving teacher-specific and student-responsive instruction.

Key Question: What are the strategies and practices that you and your colleagues use to improve instruction? Specifically, how do you work to improve teachers' instruction?

Turnaround Strategy Components	Alignment with Best Practice
Common core curriculum and aligned and rigorous instructional practices. Administrators and teachers develop and use vertically and horizontally aligned curricula and instructional strategies that includes common units, lessons, assessments, and instructional strategies and language within and across grades and content areas. Key indicators: • Teachers' unit and lesson plans are similarly structured, incorporating best practices, directly linking lesson content with the grade-level standards and standards taught in prior and subsequent grades. • A common set of instructional strategies, academic language, and other learning tools are evident in lessons and in practice, to enable students to access content.	
Defined expectations for high quality instructional practices The school has a clear instructional focus and shared expectations for instructional best practices that address students' instructional needs. Key indicators: • Leaders and teachers understand the instructional focus and how the instructional focus informs (or is evident in) classroom practice. • Teachers have received training and professional development on the instruction focus and related instructional strategies.	
Teacher support and feedback to improve instruction Teachers are actively supported to develop high quality lessons, deliver high quality lessons and instruction and to become experts in using and refining effective instructional strategies. Key indicators: • The principal (or administrators or coaches) spend significant time in classrooms, observing teachers' instruction and providing teachers with constructive and useful feedback on instructional practices. • Teachers (and teacher team) use a variety of standards-based assessments to assess the effectiveness of instructional strategies and modify instruction accordingly.	

- Teachers and administrators reported the use of Kagan instructional strategies which correlate to Marzano's research on student engagement.
- It was reported the Kagan strategies were selected by the building.

- Teachers and administrators reported that they have received training before the start of school as well as during the first semester of the year with a focus on Kagan strategies.
- Observations revealed that some teachers record the Kagan strategy being used within the agenda section of the blackboard configuration.
- Students were observed working in pairs discussing and completing class work.
- The team observed teachers asking questions about what the pairs had discovered, and encouraged students to ensure that their partners understand and can explain the answer they found to the question provided.
- Teachers and administrators reported the use of Collins writing to improve student writing skills.
- Teachers reported seeing students move from being reluctant writers to willing writers in class.
- Classroom observations revealed Collins' writing strategies being used in classrooms.
- The team observed posters of the types of Collins writing as well as the identification of the type of writing the students was expected to complete during the lesson.
- The team observed students writing in multiple classes with a mix of reluctant and willing writers.
- The team observes a teacher assisting and encouraging students as they worked on completing a summary statement as an exit ticket for the class.
- Teachers and administration reported that scheduled observations occur monthly and that feedback is provided in a timely manner.
- Teachers also reported that they have opportunities to observe colleagues provide instruction.
- Focus groups reported that a single document outlining "look fors" was created by the staff and is utilized to collect data and provide feedback.
- Focus groups reported that school offers duel enrollment through Wayne State and Wayne County Community College.
- Focus groups reported that college professors from Wayne County Community College and Wayne State come to the building to provide writing workshops and duel enrollment courses.
- Instructional coaches are provided to staff to assist with improving instructional practices.
- Through community partners (retired GM executive) the school offers robotics to the students.
- It was reported that the robotics club received an award for rookie team of the year at a competition.
- It was reported that the success of the program has led to an expansion to another school on the Osborne campus.
- Focus groups shared that the school offers a business (finance/marketing) pathway for students.

Turnaround Strategy Domain 3: *Providing Student-Specific Supports and Instruction to All Students*

The school is able to provide student-specific supports and interventions informed by data and the identification of student-specific needs

Key Question: How, and to what extent, does your school provide student-specific supports and interventions to students?

Turnaround Strategy Components	Alignment with Best Practice
Tiered and Targeted Interventions for Students and Monitoring for Effectiveness The school has a system (structures, practices, resources) for providing targeted instructional interventions and supports to all students which also includes close monitoring of the impact of tiered interventions on students' progress. Key indicators: • Students are provided with targeted, student-specific instruction and interventions in direct response to their academic areas of need, rather than placing entire groups of students in intervention groups. • The impact of classroom-based and tiered interventions is frequently monitored (e.g., regularly, in 2, 4, or 6 week intervals and often by grade-level teams or by school support teams) and then refined in direct response to students' needs.	
Data Use and Data Informed Targeting of Interventions Administrators and teachers use a variety of ongoing assessments (formative, benchmark, and summative) to frequently and continually assess instructional effectiveness and to identify students' individual academic needs. Key indicators: • A variety of valid and reliable assessments (standards-based and performance assessments) are used consistently, within and across grades and content area. • Administrators and teachers are using assessment to identify the specific students needing additional support and the targeted areas of need for each specific student.	

- Focus groups explained that they use teacher created assessments based from district common assessments, NWEA Map assessments three times annually, PSAT (10th and 11th grade), and state assessments.
- Focus groups explained that NWEA assessments are reviewed and used to provide targeting intervention through the use of tutorial, extended instruction time in the morning and during 7th hour. Resources used for targeted instruction include Kahn Academy and Study Island.
- Every focus group reported providing tutoring opportunities for the students via support staff, community volunteers and teachers.
- Students and teachers reported that teachers provide tutoring to students after school.
- A focus group explained that support services provide push-in and pullout opportunities for students with disabilities. Assistance with class work and identified skills are provided during these times.
- Students and teachers review NWEA data and establish goals that are monitored during the year.

- It was reported that staff conduct Instructional Learning Cycles (ILC) that include pre-tests, lesson design, post-testing, and re-teaching. Teachers reported the identification of 60% of the staff implementing Kagan strategies during instruction. Consequently they chose to incorporate Kagan strategies into the ILC.
- Teachers reported an increase in the use of Kagan strategies upon seeing the benefit to student academic performance through the ILC process.
- Although multiple groups reported about the variety of intervention programs available for student academic support, none of the grouped reported about a systemic tiered process for monitoring the impact of the interventions.

Turnaround Strategy Domain 4: *School Climate and Culture*

The school has established a climate and culture that provides a safe, orderly and respectful environment for students and a collegial, collaborative, and professional culture among teachers that supports the school's focus on increasing student achievement.

Key Question: How does your school attend to students' social-emotional health and establish a safe, orderly, and respectful environment for students?

Turnaround Strategy Components	Alignment with Best Practice
Safety and secure learning environment. The school has established and provides a safe and secure learning environment for students, staff and community members. Key indicators: • Student to student interaction and teacher to student interactions are respectful and considerate, as observed during the visit.	
Shared Behavioral Expectations that support student learning Administrators and teachers have and use a clearly established set of behavioral expectations and practices that supports students' learning. Key indicators: • Expectations of student behavior are written and clearly shared and understood throughout the school building. • Behavioral expectations are reinforced through consistently applied rewards and consequences (consistent among and across teachers and grades).	
Targeted and effective social-emotional supports The school has identified, established, and proactively provides effective social-emotional resources and supports for students in need of such supports and assistance. Key indicators: • The school has identified a wide array of effective social-emotional responses and supports for students in need of such assistance and support. • Students that may need or benefit from social-emotional supports are identified and receive targeted social-emotional support. • Data on the effectiveness of social-emotional supports is collected and monitored.	

• Students report that the teachers regularly demonstrate care and respect for the students.
• Students provided multiple examples of how teachers talk to the students, ask how they are if they appear unhappy, recognize when situations at home are not going well, and refuse to hold grudges against students when they act out.
• Students reported that teachers respectfully ask how they are doing by not calling attention to their situation in front of the entire class.
• Students shared that most of the teachers work them very hard and adjust the lesson so that they can understand the material.

- Students shared that most teachers command respect from the students, however some teachers struggle with maintaining the classroom.
- Students shared that over the years that they have been at the school they have improved their own behavior and have come to realize that the teachers have a lot to offer them so that they can be successful in the future.
- Students also shared that they choose to encourage younger students to be respectful of the teachers and learn from them so that they can be successful also.
- It was reported that there is a behavior specialist students can work with when they are struggling with their behavior.
- Teachers and administrators shared that attendance is one of the schools greatest challenges. Many reasons for this were provided by multiple focus groups. Incentive programs and wraparound supports via community partners are designed to assist with reducing absenteeism.
- Multiple focus groups described the school's Triage Center. This is a system based upon GPA analysis, attendance data, and on-track off track status. Through a combination of professional understanding and data analysis of the above data points, staff identify causes of poor attendance and academic performance. The triage cycle is conducted quarterly and serves about 20% of the student population. The program focuses on removing barriers to academic success through a variety of wraparound social services and academic support.
  - o Identified students Interviewed to determine barriers to academic success. This data informs decisions that are made around the services provided to support student success.
  - o Academic and social supports are provided via social worker, counselor, teachers, tutors, and community partner programs.
  - o An administer conducts bi-weekly meetings with students to follow-up on progress.
- Focus groups reported that the school will be reinstituting restorative practices in the building to guide continued improvements in the climate and culture of the building.

Turnaround Strategy Domain 5: *District System to Support Accelerated Improvement and Turnaround*

The district has developed systems for identifying schools that are not performing well, and strategies for monitoring and supporting school leadership and teachers.
  Examples of district systems:
  - *Strategic placement and assignment of principals and teachers in high need schools, including the use of incentives to get the right leaders and teachers in high need schools.*
  - *Provision of additional staffing and resource autonomy to leaders in high need schools*
  - *Provision of additional supports (e.g., coaching supports, instructional resources) to high need schools.*

Key Questions:
  - How does the district monitor and/or support you in your efforts to improve instruction and raise student achievement?
  - To what extent has the district provided you with additional autonomy to make changes to staff (e.g., to hire new teachers and/or quickly remove teachers not supportive of your work), to the school's schedule, and in your use of resources? How much autonomy do you have?

	Alignment with Best Practice
District Capacity - Core Functions The District has established and/or provides schools with base supports necessary for effective teaching and learning (Core curriculum and professional development, assessments, data systems, instructional materials, human capital).	
District capacity - Monitor and support The district has established and communicated a district-wide improvement strategy, including a vision and specific goals for improvement. The improvement strategy includes specific strategies for monitoring and supporting schools (leaders, teachers, and students).	
District Capacity – Conditions and Autonomy The district provides schools with sufficient autonomy and authority to implement turnaround actions, while holding schools accountable for results.	

  - Administration shared the autonomy provide by the district to utilize the designated funds for the building as determined by the building.
  - Administration shared that budgetary autonomy related to general fund expenditures is limited due to high operational costs.
  - Administration shared about the "Network" structure utilized to provide support and connection between school and district.
  - Administration shared that opportunities are provided for principles at the Osborne Campus and the network participate in collaboration meetings.

Unreasonable Hardship Review Part 2b: Operational On-Site Review (Facility Conditions Index)

The SRO partnered with DTMB's Facilities & Business Services Administration Office (SFA) to determine a facility conditions index (FCI) for Osborn College Preparatory Academy. The FCI measures maintenance and repair costs against current replacement cost of the building. The lower the number, the less cost effective it is for the district to keep the building open.

All inspections were designed to be non-intrusive and the results were based on observations and assumptions given the factual knowledge provided.

FCI SCORE: 47.9

A copy of DTMB's FCI report is attached to this report as Appendix B.

Unreasonable Hardship Review Part 3: Access and Availability

Whether statutorily required under MCL 380.391(3), MCL 380.507(6), MCL 380.528(6), or MCL 380.561(6), or optionally adopted under MCL 380.1280c, the SRO is committed to completing an analysis of whether the proposed closure will result in unreasonable hardship to pupils attending Osborn College Preparatory Academy. The SRO will consider other public school options available to students in the grade levels offered and geographic area served by Osborn College Preparatory Academy to determine if the closure would result in an unreasonable hardship for the impacted students. The SRO is committed to ensuring that any closure does not necessitate the enrollment of a displaced student in another failing school. When evaluating the sufficiency of other public school options for affected pupils and unreasonable hardship, the SRO evaluates a variety of factors that can generally be organized into three different categories. These categories include, but are not limited to:

- **Geography:** Are there schools within a reasonable number or miles from the school identified that serve the same grade levels as the identified school?
- **Performance:** Are there schools that were identified during the geographic evaluation that also have an acceptable Top-to-Bottom ranking?
- **Access:** Do the students that would be displaced by the NLA Action have reasonable access to the schools identified during both the geographic and performance evaluations?

The results of the SRO's analysis are included in the below table. The number of schools that meet the parameters defined in the left most two columns is included in column #3 and the estimated capacity of the qualifying schools is included in column #4. The right-most two columns define the # of qualifying schools that would not require students to utilize the schools-of-choice legislation (MCL 388.1705/MCL 388.1705c) to gain access and the estimated capacity of those qualifying schools that would not require utilization of the schools-of-choice legislation.

Distance Parameter (Maximum in miles)	TTB Ranking Parameter (Minimum)	# of Qualifying School-of-Choice Schools	Estimated Capacity of Qualifying School-of-Choice Schools	# of Qualifying Local Access Schools	Estimated Capacity of Qualifying Local Access Schools	Total # of Qualifying Schools that Displaced Students Could Access	Total Estimated Capacity of Qualifying Schools that Displaced Students Could Access
5	25	2	87	2	0	4	87
10	25	4	301	3	2	7	303
15	25	10	386	5	4	15	390
20	25	24	629	6	92	30	721
25	25	31	714	9	219	40	933
30	25	46	828	9	219	55	1047

*Local access schools include schools within the home district and Public School Academies

Unreasonable Hardship Data Key Takeaways

- Based on 2015 enrollment data, 200 students have 7 schools within a 10 mile range earning a Top-To-Bottom ranking of 25 or greater with an estimated capacity of 303 to select as an alternative educational option.
- Schools of choice locations make up 99% of the qualifying enrollment capacity within 10 miles of Osborn College Preparatory Academy.
- Osborn College Preparatory Academy is in the same building as two other High Schools being assessed for Next Level of Accountability. The combined 2016 enrollment is 793 students.
- In a 25 mile range there is a total of 40 schools earning a Top-To-Bottom ranking of 25 or greater with an estimated capacity of 933 for the 793 students to attend; 77% of the qualifying enrollment capacity is located at a school of choice.

Unreasonable Hardship Review Part 4: Final Determination

The SRO's Final Unreasonable Hardship Determination is based on a comprehensive review of all available data, the results from both operational and academic on-site review visits and an examination the other public school options that are available to the students that would be impacted by the closure of Osborn College Preparatory Academy. All of the information produced and insights gained from the Unreasonable Hardship Review Process that have been detailed in this report, were considered when answering the three key questions that comprise the SRO's Final Unreasonable Hardship Determination.

Question 1: Are the academic and operational and academic realities of the identified school reflective of a school poised for rapid turnaround?

	The academic and operational realities of the identified school reflective of a school poised for rapid turnaround.
	The academic but not the operational realities of the identified school reflective of a school poised for rapid turnaround
	The operational but not the academic realities of the identified school reflective of a school poised for rapid turnaround
	Neither the academic nor the operational realities of the identified school reflective of a school poised for rapid turnaround

Question 2: Are there are sufficient other public school options reasonably available to these pupils?

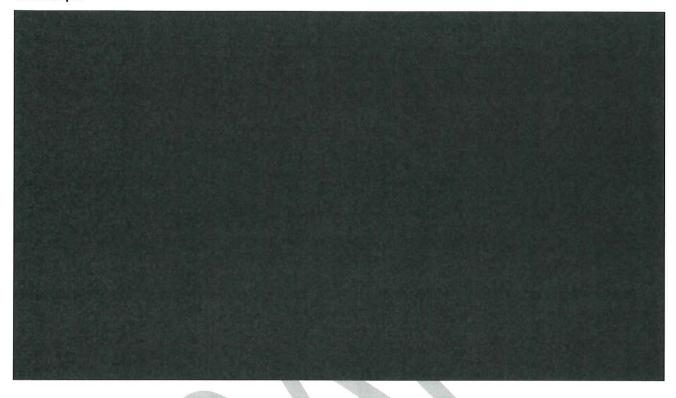|	
	There are sufficient other public school options reasonably available to these pupils?
	There are insufficient other public school options reasonably available to these pupils?

Question 3: Would the proposed NLA action result in an unreasonable hardship to the displaced pupils?

	The proposed NLA action would not result in an unreasonable hardship to the displaced pupils
	The proposed NLA action would result in an unreasonable hardship to the displaced pupils

Determination:

Next Steps:

APPENDIX A: SRO Unreasonable Hardship Data Request Packet

The SRO is committed to ensuring that the Unreasonable Hardship Determination required under MCL 380.391(3), MCL 380.507(6), MCL 380.528(6), MCL 380.561(6), or optionally adopted under MCL 380.1280c is as informed as possible. Therefore, the SRO is requested that the following information be provided in an editable format (e.g., .doc, .docx, .xls, .xlsx, etc.) by Tuesday, February 1, 2017. Where possible, the information provided will be verified against previously reported and publically available data.

Data review components:
- Academic
- Climate and Culture
- Professional
- Operational

Academic Data

Top-to-Bottom Rankings by Year

2012	2013	2014	2015	2016
NULL	3	0	0	0

Student Proficiency – Mathematics

Student Group	% Proficient or Above 2013-2014	% Proficient or Above 2014-2015	% Proficient or Above 2015-2016
All Students			
Native American			
Asian			
African-American			
Hispanic			
Native Hawaiian, Pacific Islander			
White			
Multi-Race, Non-Hispanic			
Economically Disadvantaged			
Students with Disabilities (IEP & 504)			
English Language Learners			

Student Proficiency – Reading/ELA

Student Group	% Proficient or Above 2013-2014	% Proficient or Above 2014-2015	% Proficient or Above 2015-2016
All Students	7.14		8.7
Native American			
Asian			
African-American	7.14		8.7
Hispanic			
Native Hawaiian, Pacific Islander			
White			
Multi-Race, Non-Hispanic			
Economically Disadvantaged	8.33	5.56	7.89
Students with Disabilities (IEP & 504)			
English Language Learners			

Student Proficiency – Science

Student Group	% Proficient or Above 2013-2014	% Proficient or Above 2014-2015	% Proficient or Above 2015-2016
All Students			
Native American			
Asian			
African-American			
Hispanic			
Native Hawaiian, Pacific Islander			
White			
Multi-Race, Non-Hispanic			
Economically Disadvantaged			
Students with Disabilities (IEP & 504)			
English Language Learners			

Student Proficiency – Social Studies

Student Group	% Proficient or Above 2013-2014	% Proficient or Above 2014-2015	% Proficient or Above 2015-2016
All Students	███████		
Native American			
Asian			
African-American	███████		
Hispanic			
Native Hawaiian, Pacific Islander			
White			
Multi-Race, Non-Hispanic			
Economically Disadvantaged	███████		
Students with Disabilities (IEP & 504)			
English Language Learners			

4-Year Graduation Rates (if Applicable)

Student Group	# In Cohort 2013-2014	% Graduated 2013-2014	# In Cohort 2014-2015	% Graduated 2014-2015
All Students	77	68.8%	68	67.7%
Male	37	54.1%	39	66.7%
Female	40	82.5%	29	69.0%
Native American	███████			
Asian				
African-American	74	70.3%	68	67.7%
Hispanic	███████			
Native Hawaiian, Pacific Islander				
White				
Multi-Race, Non-Hispanic				
Economically Disadvantaged	60	70.0%	55	65.5%
Students with Disabilities (IEP & 504)	17	70.6%	15	46.7%
English Language Learners	███████			

Climate and Culture Data

Enrollment by Subgroup[2]

Race	2013-2014	2014-2015	2015-2016
All Students	265	232	200
Male	145	130	108
Female	120	102	92
Native American			
Asian			
African-American	264	231	197
Hispanic			
Native Hawaiian, Pacific Islander			
White			
Multi-Race, Non-Hispanic			
Economically Disadvantaged	196	185	153
Students with Disabilities (IEP & 504)	77	63	43
English Language Learners			

Enrollment by Grade

	K	1	2	3	4	5	6	7	8	9	10	11	12	Total
2013-2014	0	0	0	0	0	0	0	0	0	53	82	68	62	265
2014-2015	0	0	0	0	0	0	0	0	0	47	63	64	58	232
2015-2016	0	0	0	0	0	0	0	0	0	52	48	54	46	200

Special Population Percentages

	2013-2014 (%)	2014-2015 (%)	2015-2016 (%)
English Language Learner			
Students with Disabilities (IEP & 504)	29.1%	27.2%	21.5%
Economically Disadvantaged	74.0%	79.7%	76.5%

Attendance

	2013-2014	2014-2015	2015-2016
Attendance Rate (%)	75.1%	76.2%	77.4%
Percent Chronically Absent	88.5%	78.1%	84.5%
Chronically Absent Student Count	254	192	180

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[2] Enrollment by student(s) does not necessarily indicate that the student(s) will take state assessments.

Professional Data

Teacher Evaluations

	# of Teachers 2013-2014	% of Teachers 2013-2014	# of Teachers 2014-2015	% of Teachers 2014-2015	# of Teachers 2015-2016	% of Teachers 2015-2016
Highly Effective	18	90.0%	12	75.0%	11	78.6%
Effective	1	5.0%	3	18.8%	3	21.4%
Marginally Effective	1	5.0%	0	0.0%	0	0.0%
Ineffective	0	0.0%	1	6.3%	0	0.0%

Total Teachers	20		16		14	